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8  
9 IN THE UNITED STATES BANKRUPTCY COURT  
10 FOR THE DISTRICT OF OREGON

11 In re

12 Salpare Bay, LLC,

13 Debtor.

Case No. 10-35333-tmb11

DEBTOR'S RESPONSE TO J.E. DUNN  
CONSTRUCTION COMPANY'S  
MOTION FOR TEMPORARY  
ALLOWANCE OF CLAIM

14  
15 Salpare Bay, LLC (the "Debtor") hereby responds to J.E. Dunn Construction  
16 Company's Motion for Temporary Allowance of Claim (the "Motion") as follows.

17 The Debtor does not concede that the background facts set forth in J.E. Dunn  
18 Construction Company's ("Dunn") motion are correct or that Dunn's claim should be allowed  
19 for any purpose in the amount asserted by Dunn. However, the Debtor does not object to the  
20 temporary allowance of Dunn's claim for voting purposes because Dunn is separately classified  
21 from other creditors and, thus, the amount of its claim has no effect on whether its class is  
22 deemed to accept or reject the Debtor's plan. The Debtor preserves its rights to object to the

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1 amount, validity and nature of Dunn's claim as set forth in the Debtor's objection to Dunn's  
2 claim and as set forth in the adversary proceeding currently pending against Dunn.

3 Dated: November 8, 2010.

4 FARLEIGH WADA WITT

5 By: /s/ Tara J. Schleicher

6 Tara J. Schleicher, OSB #954021

7 TSchleicher@fwwlaw.com

8 Christopher L. Parnell, OSB #054352

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 8, 2010 I served the foregoing **DEBTOR'S RESPONSE TO J.E. DUNN CONSTRUCTION COMPANY'S MOTION FOR TEMPORARY ALLOWANCE OF CLAIM** on the following parties via electronic notification, e-mail, facsimile or by depositing a true copy thereof, contained in a sealed envelope, with first-class postage prepaid, addressed to said parties at the last known address shown below and in the U.S. mail at Portland, Oregon:

Salpare Bay, LLC  
2501 NE 134<sup>th</sup> Street #300  
Vancouver, WA 98686  
**First Class Mail**  
Debtor

United States Trustee  
620 SW Main Street, Suite 213  
Portland, OR 97205  
**Electronic Notification**

Stoel Rives  
900 SW Fifth Ave.  
Portland, OR 97204-1268  
**First Class Mail**

Campbell Crane  
8001 NE 14th Pl.  
Portland, OR 97211  
**First Class Mail**

Team Builder JLS  
14205 SE 36th St.  
Ste. 200  
Bellevue, WA 98006  
**First Class Mail**

Fusion Partners  
1801 N. Lamar St.  
Dallas, TX 75202  
**First Class Mail**

Professional Serv. Industries  
6032 N. Cutter Circle #480  
Portland, OR 97217  
**First Class Mail**

Landerholm Memovich Lansverk  
PO Box 1086  
Vancouver, WA 98666-1086  
**First Class Mail**

Intelligent Community Services  
1030 Northwest 12th Ave.,  
Portland, OR 97209  
**First Class Mail**

Paradigm Communications  
PO Box 65229  
Seattle, WA 98155  
**First Class Mail**

Portland General Electric  
PO Box 4438  
Portland, OR 97208  
**First Class Mail**

URS Corporation  
1950 North Stemmons Freeway, Suite 6000  
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Fountain Technologies  
5673 SW Cheltenham Dr.  
Portland, OR 97239  
**First Class Mail**

Acme Construction Supply  
330 SE Salmon St.  
Portland, OR 97214  
**First Class Mail**

Jan D Sokol  
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2300 SW 1st Ave Ste 200  
Portland OR 97201  
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Peter J Viteznik  
Kilmer Voorhees & Laurick PC  
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Portland Monthly  
623 SW Oak St., #300  
Portland, OR 97205  
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170 W Dayton #206  
Edmonds, WA 98020  
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City of Portland  
City Attorney's Office  
Attn: Linda Law  
1221 SW 4<sup>th</sup> Ave., Rm. 430  
Portland, OR 97204  
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Allentown, PA 18104  
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Jennifer Aspaas  
Routh Crabtree Olsen, P.S.  
13555 SE 36<sup>th</sup> St., Suite 300  
Bellevue, WA 98006  
**Electronic Notification**

Dated: November 8, 2010.

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